

JUL - 5 2007

## UNITED STATES DISTRICT COURT

SOUTHERN

DISTRICT OF

TEXAS

Michael N. Milby, Clerk of Court

UNITED STATES OF AMERICA  
V.

## CRIMINAL COMPLAINT

BIMBOLA SIMEON AMOSU aka  
WILLIAM AMMONS

Case Number: H-07-007M

(Name and Address of Defendant)

I, the undersigned complainant, state that the following is true and correct to the best of my knowledge and belief. On or about December 19, 2006 in Harris County, in  
(Date)

the Southern District of Texas defendant(s) did,

(Track Statutory Language of Offense)

knowingly combined, conspired, confederated and agreed with each other and other persons known and unknown to violate the laws of the United States, namely Mail Fraud, and

knowingly devised or intended to devise any scheme or artifice to defraud, or to obtain money or property by means of false or fraudulent pretenses, representations, or promises, and for the purpose of executing such scheme or artifice, placed or caused to be placed or deposited in any Post Office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the US Postal Service, which conduct also affected a financial institution,

in violation of Title 18 United States Code, Section(s) 371 and 1341.

I further state that I am a(n) United States Postal Inspector and that this complaint is based on the  
Official Title  
facts related in the affidavit attached hereto and made a part of this complaint.

Matthew S. Boyden  
Signature of Complainant

Postal Inspector Matthew S. Boyden  
Printed Name of Complainant

Sworn to before me and signed in my presence,

July 5<sup>th</sup>, 2007 at  
Date

Houston, Texas  
City and State

Stephen Wm. Smith - U.S. Magistrate Judge  
Name and Title of Judicial Officer

Steph W. Smith  
Signature of Judicial Officer

## AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. Affiant, United States Postal Inspector Matthew S. Boyden, has been employed by the U. S. Postal Inspection Service since January 2000. Affiant is currently assigned to the Major Fraud team in Houston, Texas. Prior to that, Affiant served as a lieutenant of police for a municipal police department in Texas. Affiant has served in the U.S. Air Force as a Law Enforcement Specialist and criminal investigator for the Air Force Office of Special Investigations. Affiant has received specialized training in numerous Postal crimes, but primarily those involving "identity theft" and mail fraud related offenses. Affiant has attended training in the areas of check fraud, credit card fraud, and identity takeover schemes. Affiant has investigated hundreds of cases involving fraud, identity theft, and related "white collar" types of offenses. Affiant is authorized to obtain and execute Federal Arrest and Search Warrants. This Affidavit is made in support of a criminal complaint filed against Nigerian National **Bimbola Simeon Amosu aka William Ammons**.

2. The information set forth in this Affidavit is based upon your Affiant's personal knowledge and/or information provided to Affiant by other law enforcement agents and officers, witnesses, bank investigators, and cooperating individuals Affiant believes to be reliable and credible.

3. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each and every fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that **Bimbola Simeon Amosu** (Amosu) has committed violations of federal law.

4. On December 19, 2006, Houston Police Department Lieutenant J. B. Zera stopped a red-colored 2004 Honda in the 9700 block of Court Glen, Houston, Harris County, Texas. The vehicle, displaying Texas license plate #010GMC, did not have a front license plate. A computer check also disclosed multiple warrant references listed on the vehicle's license plate. The driver and sole occupant was identified as Folashade Amosu-Scott. The vehicle was registered to Folashade Amosu-Scott. A review of her driver's license showed it was currently under suspension. Lt. Zera placed Amosu under arrest for the violation and she

was transported to the Harris County Jail for processing. During a search of her vehicle (incident to arrest and "inventory"), a large volume of mail, credit cards, credit reports, and other items indicative of "identity theft" activities was seized.

5. On April 16, 2007, Affiant obtained and reviewed the seized evidence taken from Folashade Amosu's vehicle. During that review, Affiant observed the following items:

- Over fifty (50) different credit profiles for different people containing Social Security numbers, dates of births, bank and credit card account information
- Over fifty (50) different letters and credit card pre-approval solicitations addressed to different people at different addresses
- United States Postal Service money order receipts
- Several credit cards in names other than Folashade Amosu
- Several credit card account convenience checks in names other than Folashade Amosu
- Over twenty (20) different cellular telephone cards (SIM) individually labeled

6. Based on Affiant's review of the evidence, it appeared that Folashade Amosu would obtain a credit card solicitation and credit report for an unsuspecting victim, then use that person's information to apply on-line or over the telephone for a bank account or credit card. Folashade Amosu would use addresses and telephone numbers she controlled or had access to on the newly created fraud accounts.

7. Affiant obtained the original U.S.P.S. money orders for two of the U.S.P.S. money order receipts found in Folashade Amosu's vehicle. Those money orders were purchased on December 7, 2006, and made payable to Wachovia Bank. They were mailed in to open two new bank accounts established at Wachovia Bank in the name "Jennifer E. Bender". Written on the money orders are the "Sender's" name Jennifer Bender and the account numbers Savings #3000088219742 and Checking #1010153027136.

8. On May 8, 2007, Affiant contacted Dwaine Bramwell, Assistant Vice President, Corporate Fraud Investigations, Wachovia Bank, who stated that two accounts had been opened on November 27, 2006, in the name Jennifer E. Bender using an address of 1442 NW 154<sup>th</sup> Avenue, Pembroke Pines, Florida 33028. Those accounts were each established

with the previously discussed U.S.P.S. money orders. In addition to possessing the U.S.P.S. receipts, Folashade Amosu was in possession of the true Jennifer E. Bender's credit profile (including Social Security number, date of birth, etc.). She also possessed several letters from Wachovia Bank addressed to Jennifer E. Bender that had been mailed to the Florida address. Those letters contained a new credit card, credit card convenience checks, and other correspondence. These items were mailed by Wachovia Bank based on the establishment of the new Jennifer E. Bender accounts.

9. On May 15, 2007, Affiant contacted the true Jennifer E. Bender who stated she did not authorize anyone to possess or use her personnel identity information. She stated she was unaware that her identity information had been compromised and confirmed she did not know anyone named Folashade Amosu.

10. On May 16<sup>th</sup>, 2007, Affiant prepared and obtained a Federal criminal complaint charging Folashade Amosu with Fraud in Connection with Identification Information and Mail Fraud. She was transferred from State custody to Federal custody where she was detained. On June 20<sup>th</sup>, 2007, Folashade Amosu was indicted by a Federal Grand Jury and charged with numerous counts of fraud and related violations. She remains in Federal custody.

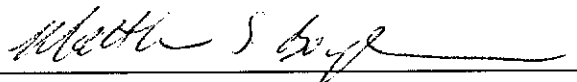
11. On or about May 14<sup>th</sup>, 2007, Affiant submitted the evidence seized from Folashade Amosu's arrest (in December 2006) to the United States Postal Inspection Service forensic laboratory for fingerprint analysis. On June 7<sup>th</sup>, 2007, Affiant received a written report from the latent print examiner stating that the fingerprints of **Bimbola Simeon Amosu aka William Ammons** had been identified on a Wachovia Bank letter addressed to Jennifer E. Bender that had been mailed to 1442 NW 154<sup>th</sup> Avenue, Pembroke Pines, FL 33028. This was a letter found in the possession of Folashade Amosu when she was arrested in December 2006.

12. On June 27<sup>th</sup>, 2007, Folashade Amosu was interviewed by Affiant in the company of her attorney. Folashade Amosu stated that **Bimbola Amosu** is the younger brother of her ex-husband and her partner or accomplice in her fraudulent activities. She stated that

**Bimbola Amosu** was currently living in Florida and provided her the fraudulent addresses she was using there. She stated that **Bimbola Amosu** would retrieve the Florida mail and then mail it her in Houston, Texas. She stated that **Bimbola Amosu** is heavily involved in credit and mail fraud activities and had been arrested in Georgia under an alias. She stated that **Bimbola Amosu** was aware that law enforcement authorities were looking for him and was currently "on the run".

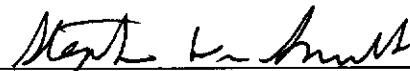
13. Affiant has obtained and reviewed criminal history records for Bimbola Simeon Amosu that depict he has been arrested for forgery, financial transaction card fraud/theft, and financial identity fraud. He served two years in prison and is currently serving 12 years probation in Rockdale County, Georgia. Bimbola Amosu utilized the alias William Ammons in that Georgia case. A routine check determined that Bimbola Amosu is currently a fugitive in Georgia.

10. Based upon the above, the undersigned believes there is probable cause to believe that Bimbola Simeon Amosu aka William Ammons has committed crimes in violation of Title 18, United States Code, Sections 371 and 1341.



**Matthew S. Boyden**  
**United States Postal Inspector**

Sworn and Subscribed to me this 5<sup>th</sup> day of July, 2007, and I find probable cause.



**Stephen Wm. Smith**  
**United States Magistrate Judge**